

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2017, upon consideration of Co-Lead Class Counsel's Motion for an Injunction Prohibiting Improper Communications with the Class by Class Member Fred Willis, through his Organizations, NFL Players Brains Matter™, HPN Neurologic®, and HPN Concussion Management®, or Otherwise, it is hereby ORDERED that Co-Lead Class Counsel's Motion is GRANTED.

Fred Willis and his organizations are hereby ordered to cease and desist all improper communications with Class Members about the Settlement, either directly or through information

posted to their websites. Fred Willis and his organizations are ordered to remove from their websites all misinformation and falsehoods concerning the Settlement.

IT IS FURTHER ORDERED that Co-Lead Class Counsel shall submit proposed language for a Curative Notice, which Curative Notice shall be disseminated according to a further Order of this Court. Mr. Willis is hereby ORDERED to pay the costs of disseminating said Curative Notice.

IT IS FURTHER ORDERED that Co-Lead Class Counsel shall be permitted to obtain discovery from Mr. Willis, in the form of interrogatories and/or a deposition, to determine (1) whether Mr. Willis is working with any lawyers and/or litigation funders, and, if so, their identities and the nature of their involvement; and (2) whether any Retired Players have signed up with or contacted Mr. Willis' organizations and if so, their identities, and the terms of the arrangements, if any. Mr. Willis is hereby ORDERED to cooperate fully in these discovery efforts.

Anita B. Brody
United States District Judge